A.J. Eggenberger, Chairman John E. Mansfield. Vice Chairman Joseph F. Bader Larry W. Brown Peter S. Winokur

DEFENSE NUCLEAR FACILITIES SAFETY BOARD



625 Indiana Avenue, NW. Suite 700 Washington, D.C. 20004-2901 (202) 694-7000

September 17, 2008

The Honorable James A. Rispoli Assistant Secretary for Environmental Management U. S. Department of Energy 1000 Independence Avenue, SW Washington, DC 20585-0113

Dear Mr. Rispoli:

The Defense Nuclear Facilities Safety Board (Board) is conducting a series of reviews of the integrity of high-level waste tanks and the long-term viability of supporting safety systems. As part of this effort, the Board's staff visited the Hanford Site during June 3–5, 2008, to review maintenance management at the Hanford Tank Farms. This review revealed that the management of maintenance activities adequately addresses emergent problems with the Tank Farms' safety systems and provides for upgrades of those systems. However, the Board would like to bring to your attention several important issues identified during this review:

- The Office of River Protection is not conducting periodic comprehensive assessments of the contractor's maintenance management programs as required by DOE Order 433.1 A, *Maintenance Management Program for DOE Nuclear Facilities*. An effective maintenance program includes the elements of planning, engineering, resource allocation, procurement, work control, testing, and calibration. The Order requires periodic in-depth assessment of these elements to ensure a safe and effective program.
- The contractor's assessment program requires improvement in both the scope of assessment and implementation of corrective actions. Contractor assessments performed in the previous 2 years have failed to evaluate several key aspects of maintenance, particularly work practices and training. In some cases, the Tank Farms contractor has not clearly defined maintenance requirements or effectively planned maintenance activities.

Interfaces among the contractor's operations, engineering, and maintenance organizations require improvement to ensure that the impact of maintenance activities is factored into facility operations and engineering.

The enclosed report details the above issues and is provided for your information and use as appropriate. Please contact me if you have any questions regarding this matter.

Sincerely,

A. J. Eggenberger

Chairman

Enclosure

c: Ms. Shirley J. Olinger Mr. Mark B. Whitaker, Jr.